

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

United States District Court
Southern District of Texas
FILED

for the

Southern District of Texas

MAR 30 2018

United States of America

v.

Karol Lizbeth GUERRA-Solis (Y.O.B. 1999)
Citizenship: Mexico

David J. Bradley, Clerk

Case No. *M-18-0671-M**Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 29, 2018 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:*Code Section*

21 USC 841/952

Offense Description

Defendant did knowingly and intentionally possess with the intent to distribute and knowingly and intentionally import into the United States approximately 10.5 kilograms of Cocaine.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.*approved by*
*AUSTIN**Carlos M Berrios**Complainant's signature*

Carlos Berrios, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/30/2018*8:40 am**Pat S. O'Connell**Judge's signature*City and state: McAllen, Texas*Printed name and title*

Attachment "A"

On March 29, 2018, at approximately 1342 hours, Karol Lizbeth GUERRA-Solis drove her white 2012 Ford Focus from Mexico to the Pharr, Texas Port of Entry (POE) and presented herself for inspection to Customs and Border Protection (CBP) in the vehicle lane. GUERRA and her vehicle were referred to the Z-Portal x-ray for further inspection, where the Z-Portal operator noticed anomalies in the vehicle's dashboard. Intrusive inspection by CBP Officers led to the discovery of 10.5 kilograms of a substance that tested positive for the characteristics of cocaine concealed in bundles in the vehicle's dashboard. CBP requested assistance from Homeland Security Investigations (HSI) in McAllen.

At approximately 1537 hours, a HSI McAllen Special Agent and CBP Task Force Officer arrived at the Pharr POE and began an interview of GUERRA. After waiving her Miranda Rights, GUERRA admitted to HSI Agents she knew the vehicle she was driving had narcotics concealed within. GUERRA told HSI Agents her intention was to take the vehicle with narcotics to a residential address in McAllen, Texas, where unknown individuals would extract the narcotics from the vehicle inside the garage of the home.

Once the narcotics were extracted, GUERRA stated she intended to return to Mexico with the vehicle. GUERRA stated she would be paid \$1,000 U.S. Dollars for transporting the narcotics, and she has transported narcotics into the United States on three prior occasions utilizing the same method.